

18-1528-WS-AIR

FILE

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VIA REGULAR U.S. MAIL

CHAIRMAN OF PUBLIC UTILITIES
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180 East Broad Street
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PUCO

Re: *In the Matter of the Application of Columbia MHC East LLC d/b/a Columbia Park Water and Sewer System for an Increase in Rates and Charges*
Supreme Court of Ohio, Case No. 2019-0347

Dear All:

Enclosed is a copy of the Brief Amicus Curiae of Columbia Park Homeowners/Tenants Association in Support of Intervenor-Appellee M. Shapiro Real Estate Group Ohio, LLC, Through Kimberly Scott, which is being filed in the above-referenced matter.

Very truly yours,



Robin Shell
Assistant to Majeed G. Makhoulf

Encl.

7-11-19

IN THE SUPREME COURT OF OHIO

In the Matter of the Application of)	Case No. 2019-0347
Columbia MHC East LLC d/b/a Columbia)	
Park Water and Sewer System for an)	On Appeal from the Public Utilities
Increase in Rates and Charges)	Commission of Ohio
)	
In the Matter of the Application of)	PUCO Case No. 18-1294-AEM
Columbia MHC East LLC d/b/a Columbia)	18-1528-WS-AIR
Park Water and Sewer System for an)	
Increase in Rates and Charges)	

**BRIEF AMICUS CURIAE OF COLUMBIA PARK HOMEOWNERS/TENANTS
ASSOCIATION IN SUPPORT OF INTERVENOR-APPELLEE M. SHAPIRO REAL
ESTATE GROUP OHIO, LLC, THROUGH KIMBERLY SCOTT**

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STATEMENT OF FACTS

Amicus adopts the Statement of Facts submitted by Intervenor M. Shapiro Real Estate Group Ohio, LLC, through Kimberly Scott (the “Receiver”).

ARGUMENT

The Columbia Park Homeowners/Tenants Association represents the residents of the Columbia Park manufactured home community in Olmstead Township, Ohio. The community is the largest manufactured home community in Ohio with over 1,500 homeowners. It is a 55-plus community with many seniors living on fixed incomes.

The residents are the affected parties if the requested 249% rate were to be approved. The Association respectfully respects that the Court take notice of all of the public comment included in the Record. Each comment was submitted by a resident, none of whom can afford the proposed rate increase.

The Association joins in and adopts the Answer Brief of the Intervenor.

CONCLUSION

Appellant’s assignments of error are without any merit, and the Court should affirm the Public Utilities Commission of Ohio’s decision to dismiss.

Respectfully submitted,

/s/ Majeed G. Makhoulf

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CERTIFICATE OF SERVICE

This is to certify that on July 8, 2019, a true and correct copy of the foregoing document was filed electronically and emailed to the following counsel of record:

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and by regular U.S. mail, postage prepaid to the following:

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